

RAMZY P. LADAH, ESQ.

Nevada Bar No. 11405

LADAH LAW FIRM

517 S. Third Street

Las Vegas, NV 89101

litigation@ladahlaw.com

T: 702.252.0055

F: 702.248.0055

Attorney for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RONALD CARPENTER, JR., an individual;

Plaintiff,

vs.

GORDON DENNY, an individual; PV
HOLDING CORP. dba AVIS CAR RENTAL,
a foreign corporation; CANONICAL GROUP
LIMITED, a foreign corporation; DOES I
through V, inclusive and ROE
CORPORATIONS II through V, inclusive;
Defendants.

ALLSTATE INSURANCE COMPANY,

Intervenor.

CASE NO.: 2:23-CV-00208-RFB-NJK

**STIPULATION AND ORDER TO
EXTEND JOINT PRETRIAL ORDER
DEADLINE (THIRD REQUEST)**

Pursuant to Local Rules IA 6-1, 6-2 and LR 7-1, the undersigned counsel of record for Plaintiff, Defendants Gordon Denny and PV Holding Corp and Intervenor Allstate Insurance Company hereby STIPULATE to extend the time for the parties to file their Joint Pretrial Order as set forth in the Court's Minute Order dated October 30, 2024 (ECF No. 58) by 30 days. The current deadline for said disclosure is January 2, 2025. This is the third stipulation seeking to extend the subject deadline. This extension would give the parties until February 3, 2025.

The parties submit that good cause exists for the requested extension. The parties are continuing their efforts in drafting exhibit lists and culling down the extensive exhibits in this matter for trial. Moreover, the parties recently attended private mediation on October 17, 2024. Defendant

LADAH LAW
FIRM



1 has requested additional time to fully evaluate and consider various issues that were raised during the
2 mediation, in hopes of potentially reaching a settlement agreement. Lastly, the parties fully intended
3 to finalize their efforts to meet and confer on the various trial issues by the current deadline,
4 however, Counsel for Defendant Denny recently experienced an unfortunate death in his immediate
5 family right before the Christmas holiday, placing him out of the office entirely.

6 The parties further submit that this extension is requested in good faith and with no dilatory
7 motive.

8 IT IS HEREBY STIPULATED by all parties, by and through their undersigned counsel, that
9 the deadline for the parties to submit their Joint Pretrial Order be extended to February 3, 2025.

10 Respectfully submitted,

11 DATED this 2nd day of January, 2025.

DATED this 2nd day of January, 2025.

12 **LADAH LAW FIRM**

PYATT SILVESTRI

13 /s/ Ramzy P. Ladah

/s/ Robert P. Molina

14
15 **RAMZY P. LADAH, ESQ.**

ROBERT P. MOLINA, ESQ.

16 Nevada Bar No. 11405

Nevada Bar No. 6422

17 517 S. Third Street

7670 West Lake Mead Boulevard, Suite 250

18 Las Vegas, NV 89101

Las Vegas, NV 89128

19 *Attorneys for Plaintiff*

Attorneys for Defendants

Gordon Denny and PV Holding Corp.

20 DATED this 2nd day of January, 2025.

21 **RESNICK & LOUIS, P.C.**

22 /s/ Gary R. Guelker

23 **GARY R. GUELKER, ESQ.**

24 Nevada Bar No. 10603

8925 W. Russell Rd., Suite 220

25 Las Vegas, NV 89148

Attorneys for Intervenor

Allstate Insurance Company

26
27
28 ///

Carpenter v. Denny, et al
Case No. 2:23-CV-00208

IT IS SO ORDERED.

Dated: January 3, 2025



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

LADAH LAW
— F I R M —

